CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET SACRAMENTO, CA 95814-5512



December 17, 2003

Jack Sinor Assistant General Manager Kings River Conservation District 4886 E. Jensen Avenue Fresno. CA 93725-1899

Dear Mr. Sinor,

KINGS RIVER CONSERVATION DISTRICT PEAKER PLANT 1st ROUND DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary for us to more fully understand the project and assess whether the project will result in significant adverse environmental impacts.

This set of data requests (#1-42) is being made in the areas of air quality, biological resources, cultural resources, energy resources, geology/paleo, land use, water and soil resources, traffic and transportation, transmission systems engineering, visual resources, and waste management. Written responses to the enclosed data requests are due to the Energy Commission staff on or before January 16, 2004 or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to the Presiding Committee Member assigned to the Kings River Conservation District Peaker Plant project and to me, within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 653-0062, or E-mail me at jcaswell@energy.state.ca.us.

Sincerely,

Jack W. Caswell, Energy Facility Siting Project Manager

Enclosure cc: POS

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Technical Area: Air Quality

Author: Brewster Birdsall, Matthew Layton

Construction Emission Calculations

BACKGROUND

The SPPE Application includes a comprehensive review of emissions that could occur during construction (Appendix 5.1-4). Staff believes that this demonstrates a rigorous effort by KCRD to characterize the emissions accurately, while reflecting the reductions that would occur with measures that would likely be recommended by staff. Staff has technical questions regarding some of the steps of these calculations. In these cases, staff is concerned that there may be errors that would bias the results toward underestimating the PM10 impacts. PM10 is a serious concern because of the non-attainment status of the region and the proximity of sensitive receptors to the site. We have specific questions about an adjustment factor related to use of ultra-low sulfur fuel and an emission factor for wind-blown dust. Without a better understanding of these details, staff may need to revise portions of the emission calculations.

DATA REQUESTS

- 1. Please provide an example calculation for the "Adjusted PM10 Emission Factor" shown in Table CE1 of Appendix 5.1-4. Staff needs to verify proper use of the sulfur adjustment factor that is used in deriving the PM10 factor. Upon reviewing the references supplied in the footnotes of the table, it is not clear how the sulfur adjustment factor is calculated and then used in the applicant's calculation for the PM10 factor.
- 2. Please reevaluate emission factor for fugitive wind-blown dust. Staff needs to verify proper use of control factors for this term. Staff believes that the original PM10 emission factor of 0.011 ton/acre-month (p. 6 of 7 of notes attached to Appendix 5.1-4) already reflects the reductions that would occur with vigilant dust control. Staff believes that it would be inappropriate to apply an additional 90 percent control factor (as shown in Tables CE5 and CE6 of Appendix 5.1-4).

Construction Impacts Modeling

BACKGROUND

Staff has conducted a preliminary review of the construction impacts analysis (provided in Appendix 5.1-4 of the application and on electronic CD-Rom) for the proposed project and has the following requests.

Review of the file "CONNO1.INP" reveals that an hourly emission rate of 5.68 lb/hour NOx was used for construction equipment exhaust. This emission rate would be appropriate for emissions occurring over 24 hours, but it is not appropriate for emissions

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that occur only during the 8-hour workday. Because the calculations in Appendix 5.1-4 show that no equipment would operate more than 8 hours per day, staff believes that the hourly NOx emission rate in this file should be approximately 17.06 lb/hour for 8 hours per day (basis: 136.44 lb/day divided by 8). This would require rerunning the ISC3_OLM analysis, using the "HROFDY" feature to confine the NOx emissions to daytime hours. The analysis for hourly CO and SO2 impacts also would need to be similarly revised because the emission rates in the files "CONCO.INP" and "CONSO.INP" are based on 24-hour averages.

DATA REQUESTS

- Please revise the construction impacts analysis for NOx by modeling equipment emissions during only the workday, using an 8-hour average emission rate and the "HROFDY" feature. This should result in one revised run of ISC3_OLM for comparison of project impacts with the 1-hour California Ambient Air Quality Standard for NO2.
- 4. Please revise the construction impacts analysis for CO and SO2 by modeling equipment emissions during only the workday, using an 8-hour average emission rate and the "HROFDY" feature. This should result in two revised runs of ISCST3 for comparison of project impacts with short-term California Ambient Air Quality Standards for CO and SO2.

Emission Calculations

BACKGROUND

Table 5.1-12 (p. 5.1-25) of the application shows emission rates for startup/shutdown. This table indicates that CO emissions during startup/shutdown would be similar as those for steady-state operation. Staff is concerned that the oxidation catalyst may not operate effectively at the low temperatures experienced during startup, and that until the catalyst reaches some minimum operating temperature, CO emissions may exceed the steady-state estimates.

DATA REQUESTS

5. Please provide an explanation of the anticipated oxidation catalyst design. This should include a brief description of catalyst material and minimum operating temperature. This may also warrant an explanation of the expected response time during startup or the steps that would be taken to ensure that catalyst performance is stable over all operating conditions.

BACKGROUND

The application does not include information necessary for staff to verify the PM10 emission calculations for the inlet air cooling towers and the zero liquid discharge

system (ZLD) evaporation tower. Staff could not locate information on the anticipated total dissolved solids (TDS) for the water in the cooling towers.

DATA REQUESTS

- 6. Please provide an emission calculation for PM10 from the inlet air chiller cooling towers. This should include the maximum anticipated TDS for the water in the cooling towers and the expected drift rate.
- 7. Please provide an emission calculation or emission factor for the anticipated ZLD dryer baghouse. This should include percentage of control that would be provided by the fabric filter or a maximum outlet grain-loading factor (PM10 mass per unit of air volume) and information on the volumetric flow rate.

Offsets for Mitigation

BACKGROUND

Staff encourages mitigating project emissions and impacts through the use of emission reduction credits (ERCs), and KRCD recognizes this (p. 5.1-37). However, the application does not provide any detail on how the minimum offset ratio of 1:1 for all non-attainment pollutants and their precursors would occur. Staff may need to investigate the origins of certain ERCs for validity. Additionally, staff would need to verify any inter-pollutant trading schemes, if proposed by KRCD. To provide staff sufficient time to review the mitigation package, staff needs identification of the ERCs as soon as possible.

DATA REQUESTS

8. Please provide the Certificate numbers for the ERCs dedicated to the KRCD project. This information should demonstrate that the ERCs would provide a minimum 1:1 offset ratio for the project's NOx, PM10, VOC and SO2 emissions.

Cumulative Impacts Analysis

BACKGROUND

In the application (p. 5.1-38), KRCD indicates that because of minor project-related impacts, no separate cumulative analysis would be necessary to determine that the impacts would not be cumulatively considerable. Staff needs to verify whether other new sources may cumulatively impact the project vicinity. To accomplish this, other new stationary emission sources located near the KRCDPP should be identified.

DATA REQUESTS

9. Please coordinate with the SJVAPCD to identify any new or modified stationary sources within 10 kilometers (6.2 miles) of the KRCDPP site. This should include sources that either began operation after January 1, 2003 or received an

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Authority to Construct (ATC) permit after January 1, 2000 but are not yet operational, and sources that have submitted complete ATC applications to the District. Please also include the location (in terms of UTM coordinates) of the identified sources and the net emission increase of NOx, CO, SOx, or PM10.

10. Please provide an analysis of the cumulative impacts that may result from the proposed project and other reasonably foreseeable projects.

Technical Area: Biological Resources

Author: Melinda Dorin

BACKGROUND

The SPPE application contains information about the proposed transmission line in several locations: Chapter 2, Section 2.8.4 and Figure 2.8-1; Chapter 3, Section 3.11.3; and Section 5.15 pages 11-12. Section 5.15 pages 2 and 10 states red-tailed hawks, peregrine falcons and Swainson's hawks are known from the area. Raptors that are protected by the LORS identified in Section 5.15-3 can be adversely affected by colliding with transmission lines or by getting electrocuted while perching on power poles.

DATA REQUESTS

11. Please provide the proposed transmission line spacing and the bonding, and grounding measures that the KRCD is implementing. The information can be provided in writing and/or in a figure. Measures should be consistent with the Avian Power Line Interaction Committee Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996 (1996).

BACKGROUND

Section 5.15.5 of the SPPE application states that preconstruction surveys for burrowing owls will be completed. KRCD will conduct surveys, and removal as necessary, in accordance with the CDFG (1994) guidelines. No other mitigation measures are proposed.

DATA REQUESTS

12. Please provide information on habitat compensation that would meet the CDFG guidelines, and a draft proposal for monitoring relocated owls. The information to be provided should ensure that any potential impacts to burrowing owls are fully mitigated.

Technical Area: Cultural Resources

Author: Dorothy Torres

If a response reveals archaeological site locations, please submit it under confidential cover.

BACKGROUND

The applicant sent letters describing the project to Native Americans on October 10, 2003. The NAHC provided the applicant with a list of Native American contacts in the area. Letters were sent to all the individuals and groups on the list provided by the NAHC. The letter from the NAHC states, "If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received." The SPPE indicated that no responses had been received.

DATA REQUESTS

- 13. Please provide a copy of the map that was included as an attachment to the letters Native Americans.
- 14. Please provide copies of any responses from Native Americans received in writing.
- 15. If responses were not received by October 30, 2003, please provide telephone logs of the NAHC requested follow-up telephone calls or other evidence that the materials were received.

BACKGROUND

To conduct an analysis, staff needs to identify all built environment resources that are older than 45 years that could be impacted by the project.

DATA REQUESTS

- 16. Please provide a characterization of the project vicinity completed by an architectural historian or an historian with a background in industrial, architectural, or public history that meets the Secretary of Interior's Professional Standards.
 - a. Describe buildings, features and structures around the project area that could be affected (directly or indirectly) by the proposed project (whether residential or industrial). The discussion may be limited to an area one property deep, bordering on the project site (or across a road), new access roads or laydown areas; unless there is an obvious potential historic resource that may be impacted that is not within the specified one property limit.

- b. Identify all buildings or structures that are 45 years or more old.
- c. Specifically include a discussion regarding potential impacts to the setting of historic built environment resources. If the setting of an historic resource will be impacted by the project, please provide a Department of Parks and Recreation form (DPR 523) form including an evaluation.
- d. If the transmission line that will be replaced is more than 45 years old, please provide a DPR 523 form including an evaluation.
- e. If the Malaga Substation is more than 45 years old, please provide a DPR 523 form including an evaluation.
- f. Canals were important to the development of the Fresno area. Please provide DPR 523 forms for The Central Canal and Fresno Colony Canal, if they are more than 45 years old. If it appears that they will be impacted by the project, please also provide an evaluation form.
- g. Railroads were also important to the development of the Fresno area. Please record railroads, adjacent to the project, older than 45 years of age a DPR 523 form. If a railroad segment will be impacted by the project, please provide an evaluation form.

BACKGROUND

At times local historical or archaeological societies may have knowledge of cultural resources that have not been recorded.

DATA REQUESTS

- 17. Please contact local historic and archaeological associations or societies and request information regarding any cultural resources within ½ mile of the project. Please provide copies or summaries of any information obtained from these sources.
- 18. If any such resources are identified that could be impacted by the project or could have their immediate surroundings altered (change in the integrity of the setting) by this project in such a manner that the significance of the historical resource would be materially impaired, please provide the following:
 - a. If it has not been recorded on a Department of Parks and Recreation (DPR) 523 form, then please record the cultural resources on the DPR 523 form and provide a copy of the form.
 - b. A discussion of the significance of the resources under CEQA Section 15064.5(a), (3), (A)(B)(C) and (D) and provide staff with a copy of the assessment and the specialist's conclusions regarding the significance.

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BACKGROUND

To clarify the locations of potential cultural resources over the age of 45 years it is necessary to identify the cultural resources in relation to the proposed project.

DATA REQUESTS

19. On a figure similar to Figure 1.2-3 in the cultural section of the SPPE, please identify the location of archaeological or built environment (buildings, structures etc.) that are 45 years or more old. Please limit the identification to cultural resources that are adjacent to or may be impacted by the project. (Note: If the map contains archeological site location information please file it under confidential cover.)

Technical Area: Energy Resources Authors: Kevin Robinson, Steve Baker

BACKGROUND

As designated in the SPPE application, the applicant states that PG&E has determined that its current infrastructure is capable of delivering the required quantity of gas to the KRCDPP (PG&E, 2003) (KRCD 2003a, SPPE § 4.2).

DATA REQUESTS

20. Please supply the referenced letter from PG&E discussing their capability and willingness to supply natural gas to the KRCDPP.

Technical Area: Geology and Paleontology

Author: Patrick A. Pilling, Ph.D., P.E.

BACKGROUND

No legend for fault types is shown on Figure 5.11-2.

DATA REQUESTS

21. Please provide a complete legend including fault types for Figure 5.11-2.

BACKGROUND

A geologic map showing the KRCDPP site and adjacent area (to a radius of at least 2 miles) was not included in the SPPE application.

DATA REQUESTS

22. Please provide a geologic map showing geologic units at and adjacent to the KRCDPP site.

BACKGROUND

The Central Valley Thrust Fault System is not shown on Figure 5.11-2 or described in the text.

DATA REQUESTS

23. Please provide a discussion of the impacts to the plant site and associated linear facilities from the Central Valley Thrust Fault System.

BACKGROUND

Section 5.11.2.4 and Table 5.11-1 describe active and potential faults in the vicinity of the KRCDPP plant site.

DATA REQUESTS

24. Please clarify this description to verify if these faults should be described as "active and potentially active" faults.

Technical Area: Land Use Author: Ken Peterson

BACKGROUND

The Land Use section refers to 5 residences in the vicinity of the project site (p. 5.5-4). The Noise section refers to approximately 21 residences and a church apparently within a mile of the project site (p. 5.2-6) that are not discussed in the Land Use section or clearly marked on maps. Similarly, the Malaga Elementary School, located approximately .62 mile from the project site, is discussed in the Traffic and Transportation section (p. 5.7-6), but not in the Land Use section.

DATA REQUESTS

25. Please mark the above land use features (i.e., all residences, schools, and churches that are within one mile of the project site) on a color map of the site and vicinity. We suggest a 1:24,000 scale map which is the scale used by the U.S. Geological Survey for its 7.5 minute quadrangle topographic maps.

BACKGROUND

Figure 5.5-1, Primary Land Use Designations In The KRCDPP Project Area, does not clearly show or explain the General Plan land use designations for the area within one mile of the project site. The general plan designation for the project site is not discussed in the SPPE application.

DATA REQUESTS

- 26. a. Please submit a color map (the same map produced for Data Request can be used) with clear labeling of general plan land use designations for the area within one mile of the project site, and an explanation of any acronyms found in the map legend. We suggest a 1:24,000 scale map.
 - b. Please discuss the general plan designation of the project site.

BACKGROUND

The Land Use section refers to the project site as being located in Fresno County's Roosevelt Community Planning Area, and the project as being in compliance with the Roosevelt Community Plan (p. 5.5-10). This section also states that projected development for the Community of Malaga is outlined in the Roosevelt Community Plan generated by the City of Fresno (p. 5.5-14).

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DATA REQUESTS

- 27. a. Please state whether both of these Roosevelt Community Plan citations refer to the same document.
 - b. Please discuss the relationship between the City and the County in planning for the area that includes the project site and the community of Malaga.

Technical Area: Water & Soil Resources

Author: Antonio Mediati

BACKGROUND

The SPPE Application for the Kings River Conservation District Peaking Plant (KRCDPP) project proposes to use the evaporation of potable water derived from groundwater for heat rejection associated with the inlet air cooling system. The potable water will be supplied by Malaga County Water District (MCWD). The groundwater basin is severely overdrafted. The KRCDPP project proposes to use approximately 75 acre-feet per year of water from this overdrafted basin contributing to the overdraft.

DATA REQUESTS

- 28. Please provide a detailed description of other non-potable water supplies and alternative cooling technologies and their feasibility for use at KRCDPP. In the discussion of reclaimed water, please provide a detailed description as to the availability and feasibility of the use of reclaimed water, including but not limited to, quantity, quality, pretreatment requirements, pipeline construction costs, and treatment plant reliability.
- 29. If other water sources and alternative cooling technologies are determined to be infeasible, please provide a detailed description of the measures that will be employed to reduce the potential impacts of the use of groundwater from an overdrafted basin to a level that is less than significant. Impacts to the groundwater basin would be considered to be less than significant if the measures employed ensure no net increase in groundwater withdrawal as a result of the KRCDPP.
- 30. Please provide the Kings River Conservation District **2002 Annual Groundwater Report for Kings River Service Area**, and any preliminary analysis for 2003 that is available.

BACKGROUND

The KRCDPP project proposes to discharge storm water to an on-site storm water retention pond. The water discharge to this pond will percolate through the sandy soil and recharge the shallow ground water beneath the site. Ground water at the site is currently about 50 feet below ground surface. The storm water retention pond is approximately 22 feet deep at its deepest point. The depth to ground water is currently about 30 feet below the bottom of the pond.

DATA REQUESTS

31. Please provide a description of the measures being taken to ensure that contaminated water is not discharged to the retention pond during operation of

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the power plant. This description should include any mechanical devices such as oil/water separators or filters and any detention and monitoring of the water prior to release to the storm water retention pond.

Technical Area: Traffic and Transportation

Author: James Adams, Eileen Allen

BACKGROUND

The electric transmission and water sewer pipeline construction activities and associated lane closures will impact local traffic flow during construction.

DATA REQUESTS

32. Please identify the impact that the transmission line and water/sewer pipelines construction may have on local business and on street parking, and describe the mitigation measures planned to minimize the impact.

TECHNICAL AREA: Transmission System Engineering

Author: Ajoy Guha, P. E.

Senior: Al McCuen

BACKGROUND

Staff needs additional information to analyze the reliability impacts and to be confident of identifying the interconnection facilities and any downstream facilities necessary to support interconnection of the Kings River Conservation District Peaking Plant (KRCDPP) to the Pacific Gas and Electric (PG&E) system. Such interconnection should comply with utility Reliability and Planning Criteria, North American Electric Reliability Council (NERC) Planning Standards, Western Systems Coordinating Council (WSCC) Reliability Criteria, and California Independent System Operator (Cal-ISO) Reliability Criteria.

After reviewing the Application for the Small Power Plant Exemption (SPPE) for KRCDPP and the System Impact Study (SIS) report dated August 20, 2003 prepared by PG&E, staff observes the following:

- Power Flow diagrams were not provided for n-2 contingency studies when post project overload criteria violations have occurred.
- There is no one-line diagram regarding the description of the new 115 kV generator tie line showing the route, and the length of the line has been identified as three-quarters of a mile compared to a half mile as mentioned in the PG&E SIS report (Refer to Chapter 2, Section 2.8.1, Page 12 and Appendix 2.8.1, SIS report, Figure 2-1, Page 2). An existing 115 kV line (Ranchers Cotton Tap) is also shown near the proposed route along North Ave between Chestnut Ave and Willow Ave in Figure 2-2 of the SIS report (SIS report, Page 3).
- Dimensions are missing for Figure 2.8-1.
- It was stated in the Application (Refer to Section 1.2.3, Page 4) that "PG&E will construct, own and operate the transmission interconnection". But in the SIS report prepared by PG&E (Refer to Appendix 2.8.1, SIS report, Section 3, Page 3) it was stated that "KRCD will engineer, procure, construct, own and maintain its project facility and the 115 kV generator tie line".
- The single line diagram, Figure 3.11-1, in the Application shows a motor operated 1200 Ampere Line disconnect Switch at the project switchyard for the new 115 kV interconnection line to Malaga Substation. But in the SIS report prepared by PG&E (Refer to Appendix 2.8.1, SIS report, Section 8.3, Pages 11 & 12) it was stated that "The 115 kV breaker to be installed on the Malaga 115 kV bus and at the Kings River Conservation District Peaking Project facility must have two (2) sets of current transformers for each bushing".

DATA REQUESTS

- 33. Provide Power flow diagrams (MW, percent loading & P. U. Voltage) for n-2 contingency studies where post project overload criteria violations have occurred.
- 34. Provide electronic copies of the PSLF *.sav & *.drw files of all base cases, and EPCL and/or AUTOCON contingency and comparison files. Provide electronic copies of the PSLF *.dyd and *.swt dynamic data files for 2005 summer off-peak base case.
- 35. Resubmit Figure 2.8-1 (refer to the Application for SPPE, Section 2.8.1, Page 12) with necessary dimensions and clearances.
- 36. Provide a one-line Diagram(s) of the new 115 kV interconnecting overhead line with specifics and details about the mileage, route and termination facilities (Breaker and/or Line switches) at the project end and Malaga Substation. Also clarify who will design, build, own and operate the project switchyard and the new 115 kV interconnection line.

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Technical Area: Visual Resources

Author: Mark R. Hamblin

BACKGROUND

Table 5.4-2, pg. 10 in the application states, "Landscaping at the KRCDPP project site would include a mixture of plants and trees. As part of the site landscape concept, trees would be installed along portions or the northern and eastern boundaries and along the access road from North Avenue to the project site to provide screening from public views."

The applicant is proposing to use landscaping to screen the facility to mitigate a potential visual impact introduced by the proposed facility. The visual resource section of the SPPE application does not provide specifics of the landscaping to be used in order for staff to conclude that it will provide adequate screening of the facility to a less than significant impact under CEQA. Staff requests that the applicant provide specifics of the landscaping that is to be used to screen the facility.

DATA REQUESTS

- 37. Show on a copy of the KRCD Peaking Plant Project Area Map (Figure 2.2.1) the location, density, types of trees, plants and other screening measures (e.g. berm, masonry walls, etc.) that are being proposed to screen the facility. Also include the size of the trees at planting and their growth rate.
- 38. Using SPPE Visual Simulation Figure 5.4-4, provide a simulation of the project showing the proposed landscaping after 10 years of growth. Please provide an 11" X 17" high-resolution color photocopy of these simulations at life-size scale when held at a reading/viewing distance of 18 inches.

BACKGROUND

The KRCD Peaking Plant Project Area Map (Figure 2.2.1) indicates that the entire 9.5 acre facility site is to have a perimeter fence. Section 5.4.4.3 (page 14-15) states that "In addition the facility would include ". . . a chain link fence, which includes vinyl slating for screening."

The visual resource section does not provide details about the vinyl slating into the chain link fence in order for staff to conclude that combined with the proposed landscaping it will provide adequate screening of the facility to a less than significant impact under CEQA. Staff requests that the applicant provide information about vinyl slating that is to be used to screen the facility.

DATA REQUESTS

- 39. Are vinyl slats to be installed in fencing along the public road frontage of North Avenue to screen the laydown/staging area and the facility site from public view?
- 40. Please show on a copy of the Kings River Conservation District Project Area Map (Figure 2.2.1) the location(s) of fencing on the property that is to contain vinyl slats used for screening.

Technical Area: Waste Management Author: Ellie Townsend-Hough

BACKGROUND

In the SPPE Application, the KRCD is proposing a 97 MW natural gas-fired, peaking plant in an industrial area. KRCD is proposing to purchase approximately 19 acres of land. The project is proposed to be built on 9.5 acres on the northern portion, and maintain a 9.5 acre lay-down area in the southern section of the site. There is a truck maintenance shop and two warehouses located on the northern portion of the site. KRCD is also proposing to build a 700 foot natural gas pipeline.

DATA REQUESTS

- 41. Is KRCD planning to tear down the truck maintenance shop and two warehouses located on the northern portion of the site? If so, please provide information on the types and amounts of hazardous and non-hazardous wastes that might be generated from their demolition as well as how the wastes would be managed and disposed.
- 42. Please provide information on the amount of drilling mud that would be used in drilling the natural gas pipeline as well as how the used mud would be managed and disposed.